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Attorneys for Defendants  
 Kelvin Watson and Las Vegas-  
 Clark County Library District

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

**DANIELLE MILAM**, an individual,  
 Plaintiff,

vs.

**KELVIN WATSON**, an individual and  
 Executive Director for The Las Vegas-  
 Clark County Library District; **THE LAS  
 VEGAS-CLARK COUNTY LIBRARY  
 DISTRICT**, a political subdivision of the  
 State of Nevada; and **THE LAS VEGAS-  
 CLARK COUNTY LIBRARY DISTRICT  
 FOUNDATION, INC.**, a Nevada non-profit  
 corporation,

Defendants.

Case No. 2:22-cv-01048-JCM-BNW

**STIPULATION AND REQUEST FOR  
 STAY OF LITIGATION  
 PROCEEDINGS PENDING THE  
 PARTIES' MEDIATION EFFORTS**

**(FIRST REQUEST)**

Plaintiff Danielle Milam and Defendants Kelvin Watson and the Las Vegas-Clark County Library District, by and through their respective counsel of record, stipulate and request that the Court stay all litigation proceedings in this matter for 120 days, up to and including January 31, 2023, to allow the parties an opportunity to engage in mediation and determine whether an early resolution of this matter is possible. In support of this Stipulation and Request, the parties state as follows:

1. Plaintiff filed her Complaint (ECF No. 1) in this matter on July 1, 2022.

2. Pursuant to an agreement between counsel, Defendants Kelvin Watson and the Las Vegas-Clark County Library District (hereinafter "the District") acknowledged service of the Summons and Complaint on September 13, 2022 (ECF No. 4). Defendants Watson and the District currently have a deadline of October 4, 2022 to respond to the Complaint.

3. Counsel for Plaintiff and for Defendants Watson and the District have been discussing the potential mediation of this matter to determine whether an early resolution may be achieved. Counsel are currently in the process of submitting the matter to an outside mediator.

4. This request to stay the proceedings is not sought for any improper purpose or other reason of delay. Rather, it is sought only conserve the expenditures and resources of this litigation while the parties engage in mediation.

5. This is the first request to stay the proceedings in this matter.

WHEREFORE, the parties respectfully request that the Court stay the proceedings in this case for 120 days, up to and including January 31, 2023, to allow the parties to engage in mediation efforts.

DATED this 3<sup>rd</sup> day of October 2022.

DATED this 3<sup>rd</sup> day October 2022.

Respectfully submitted,

Respectfully submitted,

/s/ Mitchell Stipp

/s/ Scott M Abbott

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Attorney for Plaintiff

Attorneys for Defendants Kelvin Watson  
And Las Vegas-Clark County Library District

**IT IS SO ORDERED. Counsel is directed to file a status report with the court on February 1, 2023.**

October 3, 2022

DATE

James C. Mahan  
UNITED STATES DISTRICT JUDGE